

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

SIDNEY MANES, Administrator of the Estate
of HECTOR RIVAS,

Plaintiff,

v.

ONONDAGA COUNTY, CITY OF
SYRACUSE, WILLIAM FITZPATRICK, DR.
ERIK MITCHELL, and "JOHN DOES 1-10,"

Defendants.

Civil Action No.
5:19-cv-00844-BKS-TWD

NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendant ONONDAGA COUNTY (Defendant), by and through their counsel, Mark A. Ventrone, Deputy County Attorney, move before the Honorable Brenda K. Sannes, Chief United States District Judge of the United States District Court for the Northern District of New York for an Order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing Plaintiff Sidney Manes Complaint with prejudice and granting Defendants such other and further relief as the Court deems just and proper; and

PLEASE TAKE FURTHER NOTICE that in support of their motion Defendant relies upon the accompanying Affirmation of Mark A. Ventrone, any reply papers that Defendants may file, and any other documents of record in this case.

Dated: October 31, 2024
Syracuse, New York



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